

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE

UNITED STATES OF AMERICA)	
)	CASE No. 3:21-CR-91
v.)	
)	JUDGE CRYTZER
JESSIE DAVID GOUGH)	

THE PARTIES' JOINT SENTENCING MEMORANDUM

The United States of America, by and through LaToyia T. Carpenter, Assistant United States Attorney for the Eastern District of Tennessee, and Marcos M. Garza and Tyler M. Caviness, attorneys for the defendant, hereby jointly recommend a sentence of 24 months' imprisonment followed by three (3) years of supervised release.

Counsel for the United States avers that the Sentencing Memorandum and Motion for Downward Variance Submitted on Behalf of Jessie Gough (Doc. 42) is well-taken, but the United States believes that a sentence of 24 months' imprisonment followed by three years of supervised release is sufficient but not greater than necessary to comply with the purposes of sentencing. The defendant, through his attorneys, likewise agree that the abovementioned sentence adequately considers the sentencing factors set forth in Title 18 United States Code, Section 3553(a). Therefore, the parties hereby amend their previous sentence recommendations, and request that this Honorable Court *partially grant* the defendant's Motion for Downward Variance (Doc. 42) and sentence the defendant below the advisory guideline range to a sentence of 24 months' imprisonment followed by three years of supervise release.

The parties reserve the right to offer argument and proof at the sentencing hearing as it deems appropriate and as the Court permits. The defendant has filed a Notice of Intention to Call Witnesses (Doc. 47) and intends to call the witnesses listed in his Notice if necessary.

Respectfully submitted this 7th day of April, 2023.

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